

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES DIGGS, SR.,

Plaintiff,

-vs-

Case No: 1:07-cv-08035-GBD

NEW YORK MARINE TOWING,

Defendant.

ROBERTA E. ASHKIN (#115461515)
Local Counsel
580 Broadway, Ste. 1101
New York, NY 10012
212-965-0010
212-965-1301 - fax
robertaashkin@aol.com

FILED
U.S. DISTRICT COURT
2007 SEP 28 PM 12:28
S.D. OF N.Y.

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Roberta E. Ashkin, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Dennis M. O'Bryan
O'Bryan Baun Cohen Kuebler
401 S. Old Woodward, Ste. 320
Birmingham, MI 48009
(248) 258-6262
(248) 258-6047 - fax

Dennis M. O'Bryan is a member in good standing of the Bar of the State of Michigan.

There are no pending disciplinary proceedings against Dennis M. O'Bryan.



ROBERTA E. ASHKIN (#115461515)

Local Counsel

580 Broadway, Ste. 1101 ~~506~~

New York, NY 10012

212-965-0010

212-965-1301 - fax

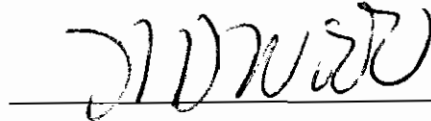
robertaashkin@aol.com

Dated: September 24, 2007

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 24th day of September 2007 a copy of the foregoing was forwarded via first class mail with postage fully prepaid thereon to:

New York Marine Towing
10 S. Flint St.
Mantauk, NY 11954



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES DIGGS, SR.,

Plaintiff,

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Case No: 1:07-cv-08035-GBD

NEW YORK MARINE TOWING,

Defendant.

STATE OF NEW YORK)
)SS
COUNTY OF)

AFFIDAVIT OF ROBERTA E. ASHKIN
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

Roberta E. Ashkin, being duly sworn, deposes and says as follows:

1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Dennis M. O'Bryan as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1979. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Dennis M. O'Bryan since 2007.

4. Dennis M. O'Bryan is associated with the firm of O'Bryan Baun Cohen Kuebler in Birmingham, Michigan.

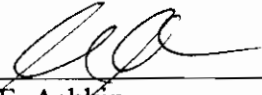
5. I have found Dennis M. O'Bryan to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Dennis M. O'Bryan, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Dennis M. O'Bryan, pro hac vice, which is attached hereto as Exhibit A.

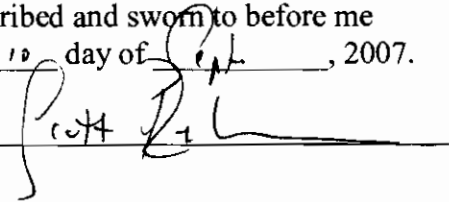
WHEREFORE it is respectfully requested that the motion to admit Dennis M. O'Bryan, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,



Roberta E. Ashkin
SDNY Bar Code: 115461515

Subscribed and sworn to before me
this 10 day of Sept, 2007.



SCOTT A. RUBMAN
Notary Public, State of New York
No. 4818174
Qualified in New York County
Commission Expires July 31, 2012

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES DIGGS, SR.,

Plaintiff,

-vs-

Case No: 1:07-cv-08035-GBD

NEW YORK MARINE TOWING,

Defendant.

ORDER FOR ADMISSION PRO HAC VICE
ON WRITTEN MOTION

Upon the motion of Robert E. Ashkin, attorney for Plaintiff and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Dennis M. O'Bryan
O'Bryan Baun Cohen Kuebler
401 S. Old Woodward, Ste. 320
Birmingham, MI 48009
(248) 258-6262
(248) 258-6057 fax
dob@obryanlaw.net

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall

immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated:

United States District Judge

UNITED STATES DISTRICT COURT

Eastern District of Michigan

CERTIFICATE OF GOOD STANDING

I, David J. Weaver, Clerk of this Court,

certify that Dennis M. O'Bryan,

was duly admitted to practice in this Court on

November 15, 1979, and is in good standing

DATE

as a member of the Bar of this Court.

Dated at Detroit, MI *on* September 21, 2007.

LOCATION

DATE

David J. Weaver

CLERK

